

May 25, 2022

Via ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: *Sheehan v. ConsenSys, Inc.*
19-cv-04154 (DLI) (CLP)

Dear Judge Merkl:

This firm represents the defendant ConsenSys, Inc. (“Defendant”). I write to advise the Court of the current status of this matter, and respectfully request that this matter be dismissed with prejudice in its entirety.

As previously reported, almost two months ago, on March 28, 2022, counsel for the plaintiff Ryan Sheehan (“Plaintiff”) indicated that Plaintiff had agreed to a “mutual walk away” to resolve this matter. On April 5, 2022, I provided Plaintiff’s counsel with a proposed settlement agreement and stipulation of dismissal for his client’s execution. At the April 13, 2022 status conference with the Court, Plaintiff’s counsel requested thirty days in which to arrange execution of those documents. When that period lapsed on May 13, 2022, the Court extended the date by which Plaintiff was to provide executed copies of those documents to today. As of the time of this submission, I have yet to receive signed copies of those documents, notwithstanding my repeated attempts to obtain them from opposing counsel (including but not limited to by written correspondence on May 20, 24 and today). Accordingly, it is respectfully requested that the Court dismiss this matter with prejudice.

I thank the Court for its attention to this correspondence.

Respectfully submitted,

/s/

Michael J. Goettig

cc: Jordan El-Hag, Esq. (*via ECF*)